

JAMES HAWKINS APLC
JAMES R. HAWKINS SBN 192925
GREGORY MAURO, SBN 222239
MICHAEL CALVO, SBN 314986
9880 Research Drive, Suite 200
Irvine, California 92618
Telephone: (949) 387-7200
Facsimile: (949) 387-6676
James@jameshawkinsaplc.com
Greg@jameshawkinsaplc.com
Michael@jameshawkinsaplc.com

Attorneys for CINDY R. CASTILLO individually,
and on behalf of all others similarly situated

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IRMA FRAUSTO, et al.

Plaintiff,

vs.

BANK OF AMERICA, N.A., et al.

Defendants.

CASE NO. **3:18-cv-01983-LB**
Hon. Laurel Beeler

**NOTICE OF FILING OF PLAINTIFF
CINDY R. CASTILLO'S MOTION
TO RELATE AND STAY
DUPLICATIVE ACTIONS**

1 **TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF**
 2 **RECORD, PLEASE TAKE NOTICE**, that on May 14, 2019, Plaintiff Cindy R.
 3 Castillo, Plaintiff in the matter entitled *Cindy R. Castillo v. Bank of America, N.A.*,
 4 Central District of California Case No. 8:17-cv-00580-DOC-KES (“*Castillo*”) has
 5 filed her Notice of Motion and Motion to Relate And Stay Duplicative Actions
 6 (“Motion”), requesting that the Hon. David O. Carter, presiding in the *Castillo*
 7 matter, relate and stay the following cases: *Irma Frausto v. Bank of America, N.A.*,
 8 Northern District of California Case No.: 3:18-cv-01983-LB (“*Frausto*”) and *Andrea*
 9 *Harrison v. Bank of America, N.A.*, Northern District of California Case No.: 3:19-
 10 cv-00316-LB (“*Harrison*”).

11 Plaintiff Castillo’s Motion is currently set to be heard on June 17, 2019 at 8:30
 12 a.m. at the Ronald Reagan Federal Building, United States Courthouse, 411 West
 13 Fourth Street, Courtroom 9D, Santa Ana, CA, 92701-4516.

14 Attached hereto as Exhibit A is a true and correct copy of Plaintiff’s Castillo’s
 15 Motion filed in the *Castillo* Action.

16
 17 Dated: May 14, 2019

JAMES HAWKINS APLC

18 By: /s/ Gregory Mauro

19 James R. Hawkins

20 Gregory E. Mauro

21 Michael Calvo

22 Attorneys for Plaintiff

23 Cindy R. Castillo
 24
 25
 26
 27
 28

EXHIBITA

EXHIBITA

JAMES R. HAWKINS (SBN 192925)
james@jameshawkinsaplc.com
GREG E. MAURO (SBN 222239)
greg@jameshawkinsaplc.com
MICHAEL J.S. CALVO (SBN 314986)
michael@jameshawkinsaplc.com
JAMES HAWKINS, APLC
9880 RESEARCH DRIVE, SUITE 200
IRVINE, CA 92618
TELEPHONE: (949) 387-7200
FACSIMILE: (949) 387-6766

Attorneys for Plaintiff, CINDY R. CASTILLO, an individual, on behalf of herself and all others similarly situated

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

CINDY R. CASTILLO, individually,
and on behalf of all others similarly
situated

Plaintiff,

v.

BANK OF AMERICA, N.A., a North
Carolina Corporation; and DOES 1
through 10, inclusive,

Defendants,

Case No. 8:17-cv-00580-DOC-KES

CLASS ACTION

Assigned to:
Hon. David O. Carter
Courtroom 9D

**NOTICE OF MOTION AND MOTION
TO RELATE AND STAY
DUPLICATIVE ACTIONS**

*[Filed concurrently with: Notice of Motion,
Declaration of Gregory Mauro, Esq.,
[Proposed] Order]*

Hearing Date and Time

Date: June 17, 2019
Time: 8:30 a.m.
Courtroom 9D

Complaint Filed: March 31, 2017
FAC Filed: August 16, 2017
SAC Filed: September 11, 2017
TAC Filed: February 16, 2018
4AC Filed: August 7, 2018
5AC Filed: January 23, 2019
Trial Date: December 17, 2019

1 **TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that on June 17, 2019 at 8:30 a.m. in Department
3 9D of the United States District Court, Central District of California, Plaintiff Cindy
4 Castillo (“Plaintiff”) will and hereby does move the Court for an Order relating and
5 staying *Irma Frausto v. Bank of America, N.A.*, Northern District of California **Case**
6 **No.: 3:18-cv-01983-LB** (“*Frausto*”), filed **February 22, 2018** Removed **March 30,**
7 **2018**, and *Andrea Harrison v. Bank of America, N.A.*, Northern District of California
8 **Case No.: 3:19-cv-00316-LB** (“*Harrison*”) filed **October 26, 2018** Removed
9 **January 18, 2019** pending the resolution of this action (“*Castillo*”), as *Castillo* is the
10 first filed case, and *Frausto* and *Harrison* are duplicative actions.

11 This motion is brought pursuant to Local Rule 7-1, and is based upon this
12 Notice of Motion, the Memorandum of Point and Authorities, the concurrently filed
13 Declaration of Gregory Mauro (“Mauro Decl”) as well as the [Proposed] Order filed
14 concurrently herewith, the pleadings and records on file, and any other evidence and
15 oral arguments as the Court may consider.

16 This motion is made following the conference of counsel pursuant to Local
17 Rules 7-3 held on May 2, 2019 to discuss the relation and stay of the *Frausto* and
18 *Harrison* Actions. The Parties have also engaged in extensive written meet and confer
19 efforts via e-mail. The Parties were unable to reach a resolution in this issue, thus
20 necessitating this instant Motion. (Mauro Decl., ¶ 7).

21 Dated: May 14, 2019

22 **JAMES HAWKINS, APLC**

23
24 By: /s/ Gregory Mauro
25 JAMES R. HAWKINS,
26 GREGORY E. MAURO
27 MICHAEL J.S. CALVO
28 Attorney for Plaintiff CINDY R. CASTILLO,
an individual, on behalf of herself and all others
similarly situated

1 **I. INTRODUCTION**

2 Plaintiff CINDY R. CASTILLO, an individual, on behalf of herself and all
 3 others similarly situated (“Plaintiff”), hereby by move this Court to relate (pursuant to
 4 L.R. 83-1.3) and stay duplicative actions concurrently pending in the Northern District
 5 of California based on the First to File Rule, as such case arises from the same or
 6 closely related transactions, happenings, or events as presently before this Court; they
 7 call for determination of the same or substantial related or similar questions of law and
 8 fact, and would entail substantial duplication of labor if heard by different judges. As
 9 such, Plaintiff moves this Court to stay the later-filed action as this case, the *Castillo*
 10 Action, is the first-filed action. Plaintiff asks that the following related cases also be
 11 stayed pending resolution in *Castillo*:

- 12 1. *Irma Frausto v. Bank of America, N.A.*, Northern District of California
 13 **Case No.: 3:18-cv-01983-LB** (“*Frausto*”), filed **February 22, 2018**
 14 **Removed March 30, 2018.** [Dkt. No. 73]; and
- 15 2. *Andrea Harrison v. Bank of America, N.A.*, Northern District of
 16 California **Case No.: 3:19-cv-00316-LB** (“*Harrison*”) filed **October 26,**
 17 **2018 Removed January 18, 2019.**

18 The above-mentioned cases should be stayed for the following reasons: (1) all
 19 actions involve the same Defendant (Bank of America, N.A.); (2) all cases involve
 20 non-exempt job positions in Bank of America’s branches in throughout the State of
 21 California; (3) all cases allege that many of the same wage and hour laws have been
 22 violated; (4) all cases present similar, if not identical, questions of law and fact; and
 23 (5) Plaintiff believes that substantially similar evidence will be used as proof of the
 24 wage and hour law violations in the above-mentioned cases as will be used in this
 25 case.

26 **II. RELEVANT FACTUAL BACKGROUND,**

27 On March, 31, 2017, Plaintiff Castillo filed this putative class action against
 28 Defendant. (Mauro Decl., ¶ 3).

On April 12, 2019, Defendant filed a Notice of Pendency of Other Actions or Proceedings identifying two class action cases, the *Frausto* Action pending in the Northern District of California, and *Clark, et al. v. Bank of America, National Association*, pending in the U.S. District Court for the District of Nevada [Dkt. No. 73]. (Mauro Decl., ¶ 4).

Defendant's Notice of Pendency identified the overlap in *Frausto* as follows: both actions (*Castillo* and *Frausto*) involve "claims for unpaid overtime, failure to provide meal and rest break, failure to timely pay final wages, failure to furnish accurate wage statements, and unlawful business practices. Further, the putative class that *Frausto* seeks to represent overlaps with the putative class at issue in the above referenced action [*Castillo*];" as *Frausto* purports to bring "her putative class action wage and hour claims on behalf of all non-exempt employees who worked for Bank of America, N.A., in California at any time on or after March 30, 2014." [Dkt. No. 73]. (Mauro Decl., ¶ 5).

During this time, Plaintiff's counsel was also made aware of the currently pending *Harrison* Action, which subsequently also overlaps with *Castillo* in terms of claims and class definitions. (Mauro Decl., ¶ 6).

As a result of the overlap of *Frausto* and *Harrison* with *Castillo*, Plaintiff's counsel reached out to Defendant's Counsel telephonically and via email to discuss the relation and stay of *Frausto* and *Harrison* pending the resolution of *Castillo* and held the conference of counsel pursuant to L.R. 7-3 on May 2, 2019. The Parties were unable to reach a resolution in this issue, thus necessitating this instant Motion. (Mauro Decl., ¶ 7).

III. THE SUBSEQUENT *FRAUSTO* AND *HARRISON* CASES SHOULD BE STAYED PENDING RESOLUTION OF *CASTILLO*

Under the first-to-file rule, a court may dismiss or stay proceedings if a similar case with substantially similar issues and parties was previously filed. *Kohn Law Grp., Inc. v. Auto Parts Mfg. Miss., Inc.*, 787 F.3d 1237, 1239 (9th Cir. 2015) (citation

1 and internal quotation marks omitted). The first-to-file rule is intended to serve the
2 purpose of promoting efficiency and should not be disregarded lightly. *Id.* (citation and
3 internal quotation marks omitted). Application of the first-to-file rule is driven by an
4 effort to maximize “economy, consistency, and comity.” *Id.* at 1240.

5 The first-to-file rule is commonly applied when a complaint involving the same
6 parties and issues has already been filed in another district. *Kohn*, 787 F.3d at 1240
7 (citation and internal quotation marks omitted). In deciding whether to apply the first-
8 to-file rule, courts analyze three factors: (1) chronology of the lawsuits; (2) similarity
9 of the parties; and (3) similarity of the issues. *Kohn*, 787 F.3d at 1240. Consideration
10 of all three factors resoundingly favors application of the first-to-file rule in this
11 instance.

12 Regarding chronology of the lawsuits, as stated above, *Castillo* is the first-filed
13 action filed back on **March 31, 2017** while *Frausto* was not filed until almost a year
14 later on **February 22, 2018** and *Harrison* was not filed until October 26, 2018, more
15 than year and a half after *Castillo*. As such, it is clear that the chronology of the
16 lawsuits favors *Castillo* as that was the first-filed case.

17 Regarding similarity of the parties, this factor also favors applying the first-to-
18 file rule because all three cases have the same Defendant (Bank of America), and all
19 three cases essentially have Bank of America’s non-exempt employees as Plaintiffs,
20 whether that is all non-exempt employees generally (*Frausto*), tellers or people with
21 similar job duties as tellers (*Harrison*) or call center employees (*Castillo*). As such,
22 the parties in these three cases are similar enough to apply the first-to-file rule here in
23 *Castillo*.

24 Regarding similarity of the issues, for the first-to-file rule to apply, “[t]he issues
25 in both cases. . . need not be identical, only substantially similar.” *Kohn*, 787 F.3d
26 at 1240. As explained in further detail below, all three cases involve substantially
27 similar issues, deal with common questions of law and fact, and these common
28 questions of law and fact can be proven through common evidence which can be

1 ascertained through a streamlined discovery process. As such, there is a similarity of
2 issues in the three cases making it appropriate for the Court to apply the first-to-file
3 rule.

4 Therefore, since Plaintiff in *Castillo* can easily meet all three of the factors for
5 applying the first-to-file rule, the Court should apply the rule and stay the later-filed
6 cases pending resolution of the *Castillo* case.

7 **IV. THE CASES INVOLVE THE SAME DEFENDANT, THE SAME NON-**
8 **EXEMPT JOB POSITIONS, AND ALLEGE MOST OF THE SAME**
9 **CLAIMS**

10 *Castillo*, *Frausto*, and *Harrison*, concern substantially the same parties and
11 concern the same Defendant, and arise from the same or closely related transactions
12 and events. See Local Rule 83-1.3.1(a). Each of the cases are wage and hour class
13 action cases and were brought on behalf of non-exempt Bank of America employees
14 who service the bank's customers in the State of California.

15 This case seeks to represent "[a]ll hourly-paid, non-managerial **call center**
16 **workers** of Bank of America, National Association, in the State of California within
17 four (4) years prior to the filing of the complaint in this action until resolution of this
18 lawsuit (hereinafter collectively referred to as the "Class" or "Class Members.") See
19 ***Castillo Fifth Amended Complaint ("5AC") Castillo Dkt No. 58*** (emphasis added).

20 The *Frausto* case seeks to represent "[a]ll persons who worked for any
21 Defendant in California as a **non-exempt employee** at any time during the period
22 beginning four years before the filing of the initial complaint in this action and ending
23 when notice to the Class is sent." See ***Frausto First Amended Complaint ("FAC")***
24 ***Frausto (Case No.: 3:18-cv-01983-LB) Dkt. No. 24*** (emphasis added).

25 The *Harrison* case seeks to represent "[a]ll current and former non-exempt
26 employees of Defendant, employed in California, who, during the time period
27 commencing four years before this complaint was filed, and until the present ("class
28 period"), worked at any of Defendant's banks as a **Teller** or a position with similar

1 duties and/or job titles.” See **Harrison FAC Harrison (Case No.: 3:19-cv-00316-LB)**
 2 **Dkt No.1** (emphasis added).

3 If there is any opposition from Defendant on this issue, an anticipated argument
 4 would be that the cases cannot be related because the cases deal with representing
 5 different job titles of Defendant’s employees. The Court should not be persuaded by
 6 this argument because although there are differences in the job titles and the
 7 representative plaintiffs worked in different branches, the job duties for each of the
 8 representative Plaintiffs are all geared to servicing the financial needs of the bank’s
 9 customers. In assisting Defendant’s customers, non-exempt, employees generally,
 10 tellers, and call center workers alike are subject to the same Bank of America policies
 11 and *de facto* practices regarding recording time, off the clock work, and meal and rest
 12 breaks. Moreover, tellers and call center workers are required to use many of the same
 13 electronic applications to accomplish their jobs, use of which generate date and time
 14 stamps of activities, which in turn reveal the time actually worked.

15 **III. THERE IS A DANGER OF DUPLICATION OF JUDICIAL** 16 **RESOURCES AND POSSIBLE CONFLICTING RESULTS**

17 There will be an unduly burdensome duplication of labor and expense or
 18 conflicting results if these cases are conducted before different Judges. Local Rule 83-
 19 1.3.1(c).

20 **A. Similar Questions of Law and Fact Will be Proven by Common** 21 **Evidence**

22 Common questions of law and fact in the above-mentioned cases include: (1)
 23 Whether Bank of America implemented and engaged in systematic practices and *de*
 24 *facto* policies resulting in non-exempt employees working off-the-clock and through
 25 meal and rest breaks, without compensation; and (2) Whether Bank of America knew,
 26 or should have known, of the off-the-clock work and that its non-exempt employees
 27 were unable to take compliant meal and rest breaks.

28 Common evidence in the above-mentioned cases include: (1) Bank of America’s

1 policies and procedures regarding recording time, working overtime and off-the-clock,
2 and the taking meal breaks and rest breaks; (2) Information and documents on goals or
3 metrics imposed on the non-exempt class members in the course of their job duties that
4 affect their performance evaluations and/or compensation; (3) Incentive and bonus
5 policies, requirements, implementation and payments; (4) Time and pay records for all
6 Plaintiffs (initially, a sample for putative class members will be sought, and upon class
7 certification, these records for all class members will be obtained for trial); (5) Activity
8 data, which is electronic data created contemporaneously to putative class members'
9 use of electronic applications that occurs in the course of performing their job duties
10 for Bank of America, and which captures the actual date and time the class members
11 worked. A comparison of Activity Data from these applications with class members'
12 corresponding electronic time and pay records may demonstrate unpaid off the clock
13 work and meals that were missed, short or late; and (6) a class list.

14 **B. Discovery in All of the Above-Mentioned Cases Will be the Same or**
15 **Substantially Similar**

16 It is anticipated that Bank of America's objections to the foregoing discovery,
17 and the related issues presented in law and motion, will be similar, if not the same, in
18 these two actions. The discovery in these cases can be streamlined to include the
19 identities of putative class members; the applicable policies that class members were
20 bound by; the electronic data and applications used by class members to clock in and
21 out, and to generate other work activity for cross-referencing; job duties and
22 requirements for the class members; and time and pay records for the class members.
23 Given that all class members use applications for work that generate activity data, the
24 discovery issues, meet and confer efforts and judicial intervention on these issues are
25 anticipated to be substantially similar, if not the same. Thus, it is likely that an unduly
26 burdensome duplication of labor and expense or conflicting results will occur if the
27 cases are heard by different Judges. Local Rule 83-1.3.1(c).

28 ///

1 **IV. CONCLUSION**

2 Because *Castillo*, *Frausto*, and *Harrison* involve the same defendant (Bank of
3 America) and non-exempt job positions in Bank of America's banking business in
4 California, allege violation of the same California wage and hour laws, present similar,
5 if not identical, questions of law and fact (Local Rule 83-1.3.1(b)); and because
6 substantially the same evidence will be used as proof and the same issues likely will be
7 presented during discovery and law and motion, it appears likely that there will be an
8 unduly burdensome duplication of labor and expense or the possibility of conflicting
9 results if the cases proceed before different judges. Local Rule 83-1.3.1(c). Therefore,
10 Plaintiffs respectfully request that this Court relate and stay *Frausto* and *Harrison*
11 pending *Castillo*'s resolution and any other relief the Court deems appropriate.
12
13

14 Dated: May 14, 2019

JAMES HAWKINS, APLC

15
16
17 By: /s/ Gregory Mauro
18 JAMES R. HAWKINS,
19 GREGORY E. MAURO
20 MICHAEL J.S. CALVO
21 Attorney for Plaintiff CINDY R. CASTILLO, an
22 individual, on behalf of herself and all others
23 similarly situated
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CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2019 I electronically filed the foregoing with the Clerk of the Court for the U.S. District Court, for the Central District of California using the CM/ECF system. All participants are registered CM/ECF users, and will be served by the CM/ECF system.

Dated: May 14, 2019

By: /s/ Gregory Mauro
GREGORY MAURO, ESQ.

JAMES R. HAWKINS (SBN 192925)
james@jameshawkinsaplc.com
GREG E. MAURO (SBN 222239)
greg@jameshawkinsaplc.com
MICHAEL J.S. CALVO (SBN 314986)
michael@jameshawkinsaplc.com
JAMES HAWKINS, APLC
9880 RESEARCH DRIVE, SUITE 200
IRVINE, CA 92618
TELEPHONE: (949) 387-7200
FACSIMILE: (949) 387-6766

Attorneys for Plaintiff, CINDY R. CASTILLO, an individual, on behalf of herself and all others similarly situated

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

CINDY R. CASTILLO, individually,
and on behalf of all others similarly
situated

Plaintiff,

v.

BANK OF AMERICA, N.A., a North
Carolina Corporation; and DOES 1
through 10, inclusive,

Defendants,

Case No. 8:17-cv-00580-DOC-KES

CLASS ACTION

Assigned to:

**Hon. David O. Carter
Courtroom 9D**

**DECLARATION OF GREGORY
MAURO IN SUPPORT OF
PLAINTIFF'S MOTION TO RELATE
AND STAY DUPLICATIVE ACTIONS**

Hearing Date and Time

Date: June 17, 2019
Time: 8:30 a.m.
Courtroom 9D

Complaint Filed: March 31, 2017
FAC Filed: August 16, 2017
SAC Filed: September 11, 2017
TAC Filed: February 16, 2018
4AC Filed: August 7, 2018
5AC Filed: January 23, 2019
Trial Date: December 17, 2019

1 I, Gregory Mauro, declare as follows:

2 1. I am an individual over the age of 18. I am an attorney at law licensed to
3 practice before all courts in the State of California and am an attorney at James
4 Hawkins, APLC, and counsel of record herein for Plaintiff CINDY CASTILLO
5 (“Plaintiff”). I submit this declaration in support of Plaintiff’s Motion to Relate and
6 Stay Duplicative Action. I have firsthand knowledge of the facts set forth in this
7 declaration and, if called to do so, could testify competently to them.

8 2. This motion brought pursuant to Local Rule 7-1, and is based upon this
9 Notice of Motion, the Memorandum of Point and Authorities, the concurrently filed
10 Declaration of Gregory Mauro (“Mauro Decl”) as well as the [Proposed] Order filed
11 concurrently herewith,, the pleadings and records on file, and any other evidence and
12 oral arguments as the Court may consider.

13 3. On March, 31, 2017, Plaintiff Castillo filed this putative class action
14 against Defendant.

15 4. On April 12, 2019, Defendant filed a Notice of Pendency of Other Actions
16 or Proceedings identifying two class action cases, the *Frausto* Action pending in the
17 Northern District of California, and *Clark, et al. v. Bank of America, National*
18 *Association*, pending in the U.S. District Court for the District of Nevada [Dkt. No. 73].

19 5. Defendant’s Notice of Pendency identified the overlap in *Frausto* as
20 follows: both actions (*Castillo* and *Frausto*) involve “claims for unpaid overtime,
21 failure to provide meal and rest break, failure to timely pay final wages, failure to
22 furnish accurate wage statements, and unlawful business practices. Further, the putative
23 class that *Frausto* seeks to represent overlaps with the putative class at issue in the
24 above referenced action [*Castillo*];” as *Frausto* purports to bring “her putative class
25 action wage and hour claims on behalf of all non-exempt employees who worked for
26 Bank of America, N.A., in California at any time on or after March 30, 2014.” [Dkt.
27 No. 73].
28

JAMES R. HAWKINS (SBN 192925)
james@jameshawkinsaplc.com
GREG E. MAURO (SBN 222239)
greg@jameshawkinsaplc.com
MICHAEL J.S. CALVO (SBN 314986)
michael@jameshawkinsaplc.com
JAMES HAWKINS, APLC
9880 RESEARCH DRIVE, SUITE 200
IRVINE, CA 92618
TELEPHONE: (949) 387-7200
FACSIMILE: (949) 387-6766

Attorneys for Plaintiff, CINDY R. CASTILLO, an individual, on behalf of herself and all others similarly situated

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

CINDY R. CASTILLO, individually,
and on behalf of all others similarly
situated

Plaintiff,

v.

BANK OF AMERICA, N.A., a North
Carolina Corporation; and DOES 1
through 10, inclusive,

Defendants,

Case No. 8:17-cv-00580-DOC-KES

CLASS ACTION

Assigned to:
Hon. David O. Carter
Courtroom 9D

**[PROPOSED] ORDER RE
PLAINTIFF'S MOTION TO RELATE
AND STAY DUPLICATIVE ACTIONS**

Hearing Date and Time

Date: June 17, 2019
Time: 8:30 a.m.
Courtroom 9D

Complaint Filed: March 31, 2017
FAC Filed: August 16, 2017
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TAC Filed: February 16, 2018
4AC Filed: August 7, 2018
5AC Filed: January 23, 2019
Trial Date: December 17, 2019

[PROPOSED] ORDER

GOOD CAUSE APPEARING THEREFORE, IT IS HEREBY ORDERED that Plaintiff's Motion to Relate and Stay Duplicative Actions is hereby **GRANTED** and Orders as follows:

1. *Irma Frausto v. Bank of America, N.A.*, Case No.: 3:18-cv-01983-LB is hereby deemed related pursuant to Local Rule 83-1.3 ;
2. *Andrea Harrison v. Bank of America, N.A.*, Northern District of California Case No.: 3:19-cv-00316-LB is hereby deemed related pursuant to Local Rule 83-1.3; and
3. *Irma Frausto v. Bank of America, N.A.*, Northern District Case No.: 3:18-cv-01983-LB and *Andrea Harrison v. Bank of America, N.A.*, Northern District Case No.: 3:19-cv-00316-LB are hereby stayed pending the resolution of *Cindy R. Castillo v. Bank of America, N.A.*, Case No. 8:17-cv-00580-DOC-KES.

IT IS SO ORDERED.

Dated:

Hon. David O. Carter
U.S. District Court Judge

CERTIFICATE OF SERVICE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to this action. My business address is: 9880 Research Drive Suite 200, Irvine, CA 92618. I hereby certify that on May 14, 2019 I caused to be served on interested parties a copy of the document(s) entitled:

- **NOTICE OF FILING OF PLAINTIFF CINDY R. CASTILLO'S MOTION TO RELATE AND STAY DUPLICATE ACTIONS**

on the interested parties in this action.

[] by placing [] the original [] a true copy thereof enclosed in a sealed envelope addressed as follows:

SEE ATTACHED SERVICE LIST

[XX] BY OVERNIGHT DELIVERY/FEDERAL EXPRESS by placing a true copy thereof enclosed in a sealed envelope, with delivery fees prepaid, deposited with the authorized overnight/Federal Express carrier/box at Laguna Hills, California, at the addresses listed on the Service List.

[XX] (FEDERAL) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

I declare under penalty of perjury under the laws of the United States and State of California that the foregoing is true and correct.

Executed on May 14, 2019 at Irvine, California.

/s/ Sheila Gonzales
Sheila Gonzales

SERVICE LIST

McGUIREWOODS LLP

Kerri H. Sakaue, Esq.
Michael David Mandel, Esq.
1800 Century Park East, 8th Floor
Los Angeles, CA 90067-1501
Telephone: 310.315.8200
Facsimile: 310.315.8210
Email: ksakaue@mcguirewoods.com
Email: mmandel@mcguirewoods.com

Sylvia J. Kim, Esq
Two Embarcadero Center, Ste 1300
San Francisco, CA 94111-3821
Tel: 415-844-9944
Fax: 415-844-9922
Email: skim@mcguirewoods.com
Attorneys for Defendant
BANK OF AMERICA, N.A.

B Bobby Saadian, Esq.
Patty W Chen, Esq.
Robert James Dart, Esq.

Wilshire Law Firm

3055 Wilshire Boulevard 12th Floor
Los Angeles, CA 90010
Tel: 213-381-9988
Fax: 213-381-9989
Email: bobby@wilshirelawfirm.com
Email: patty@wilshirelawfirm.com
Email: RDart@wilshirelawfirm.com

Nicol Elia Hajjar, Esq.

Wilshire Law Firm

611 North Howard 333
Glendale, CA 91206
Tel: 818-631-8284
Email: nicol@wilshirelawfirm.com

Justin F. Marquez, Esq.

Thiago Merlini Coelho, Esq.

Wilshire Law Firm, PLC

3055 Wilshire Blvd., 12th Floor
Los Angeles, CA 90010
Tel: 213- 381-9988
Fax: 213- 381-9989
Email: justin@wilshirelawfirm.com
Email: thiago@wilshirelawfirm.com

Richard Edward Quintilone , II , Esq.
George Andrew Aloupas, Esq.
QUINTILONE AND ASSOCIATES
22974 El Toro Road, Suite 100
Lake Forest, CA 92630
(949) 458-9675
Fax: (949) 458-9679
Email: gaa@quintlawn.com
Email: req@quintlawn.com